

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND (PROVIDENCE)

In re: Robert Leonard Oliver, Jr.,)	Case No 22-10241-DF
Debtor.)	Chapter 13
)	
JPMorgan Chase Bank, N.A.)	
Movant,)	
)	
v.)	
)	
Robert Leonard Oliver, Jr.,)	
Respondent.)	

CONSENT ORDER IN SETTLEMENT OF
MOTION FOR RELIEF

COME NOW, the parties and agree to the following Consent Order in settlement of the Movant's Motion for Relief:

1. On, September 19, 2022, Movant filed its Motion for Relief from the Automatic Stay with respect to the property known as 56 Naomi Street, Bristol, RI 02809.
2. The parties agree that the total post-petition delinquency is

Payments 6/22-11/22	6 @\$819.85	\$4,919.10
Suspense Credit		(\$40.15)
Total Amount Due		\$4,878.95

3. Debtor will cure this post-petition delinquency by:

☐ Making payments pursuant to an Amended Proof of Claim (APOC)
☐ Making payments pursuant to a Supplemental Proof of Claim (APOC)
☐ Staying current on post-petition payments (default already cured following Motion for Relief)
☐ Selling the property, no later than [__date__]
☒ Making the stipulated payments below:
☐ [other method through which delinquency will be resolved]_____

Month Stipulation Payment due	Monthly Stipulation Payment Amount	Total Monthly Payment ¹
12/15/2022	\$813.15	\$1,633.00
01/01/2023	\$813.16	\$1,633.01
02/01/2023	\$813.16	\$1,633.01
03/01/2023	\$813.16	\$1,633.01
04/01/2023	\$813.16	\$1,633.01
05/01/2023	\$813.16	\$1,633.01

____ Trustee Pay X Debtor Pay _____ Trustee and Debtor Pay

4. In addition to complying with the requirements of Paragraph 3, Debtor shall make all monthly post-petition payments as they become due to the address provided by the movant in the monthly mortgage statement.
5. Debtor authorizes Movant to mail to Debtor: (1) monthly mortgage statements; (2) account statements including an escrow analysis; and (3) notices regarding address or payment changes provided such a change is authorized by the Note and Deed of Trust. Debtor consents to direct contact by mail for purposes of receiving this information and waives any claim for violations of the automatic stay regarding the same.
6. The terms of this Stipulation and the agreement reached between the parties shall remain in effect for a period of six (6) months as to this Movant. The terms of this stipulation shall be null and void if the case is converted or dismissed.

IT IS AGREED that in the event the Debtor fails to comply with Paragraph 3 specified in this Stipulation and Order, the Movant shall file AN AFFIDAVIT OF NON COMPLIANCE WITH THE COURT AFTER TEN (10) DAY WRITTEN NOTICE OF DEFAULT SENT TO COUNSEL FOR THE DEBTOR, AND THE DEBTOR BY FIRST CLASS MAIL POSTAGE PREPAID OR FACSIMILE. Such Notice shall include a statement of any alleged default, including an itemization of all delinquent payments and the total amount necessary to cure the default.

¹ Total monthly payment due consists of the regular monthly payment of \$819.85 subject to change and the stipulation payments in column two (2) of paragraph 3

IT IS FURTHER AGREED that if the Debtor fails to cure the delinquency in full or fails to file an objection to the Notice of Default within the 14 (fourteen) days of the date of the Notice, movant shall be entitled to immediate relief from the automatic stay of 11 U.S.C §362(a) without further notice or hearing upon entry of an order for relief. For such purposes, Movant shall be free to exercise all of its rights and remedies under the Promissory Note, Deed of Trust, or as may otherwise be provided by the law. An order entered under this paragraph in accordance with Rule 4001(a)(1), is stayed until the expiration of 14 days after the entry of the order, unless the court orders otherwise. All other relief requested by Movant is hereby denied without prejudice as settled.

Agreed to on this 8th day of November, 2022.

Respectfully submitted,
JPMorgan Chase Bank, N.A., successor by
merger to Chase Home Finance LLC,
By its Attorney

/s/ Joseph Dolben

Joseph Dolben
RI Bar Number 7916
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(617)558-0500
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Robert Oliver, Jr.,
By their attorney,

/s/ Jack D. Pitts

Jack D. Pitts
635 Killingly Street
Johnston, RI 02919
(401) 453-2800
Email: pittsburnslaw@gmail.com

Dated: November 8, 2022


HONORABLE DIANE FINKLE
UNITED STATES BANKRUPTCY 11/8/22

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND (PROVIDENCE)

IN RE:

Robert Leonard Oliver, Jr.,

Debtor

Case No. 22-10241-DF

Chapter 13

CERTIFICATE OF SERVICE

I, Joseph Dolben, state that on November 8, 2022, I electronically filed the foregoing document with the United States Bankruptcy Court for the District of Rhode Island on behalf of JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Jack Pitts
John Boyajian
Gary L. Donahue

I certify that I have mailed by first class mail, postage prepaid, the documents electronically filed with the Court on the following non CM/ECF participants:

Robert Leonard Oliver, Jr.,
a/k/a Robert Oliver
56 Naomi St
Bristol, RI 02809

Robert D. Orsini
332 State Street
Bristol, RI 02809

Respectfully submitted,
JPMorgan Chase Bank, N.A., successor by merger
to Chase Home Finance LLC,
By its Attorney

/s/ Joseph Dolben

Joseph Dolben
RI Bar Number 7916
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Dated: November 8, 2022